



BNC ENGINEERING, LLC

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April 8, 2005

Rafael Casanova
Remedial Project Manager
U.S. EPA
Superfund Division (6 SF-L)
1445 Ross Avenue Suite 1200
Dallas, TX 75202-2733

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RE: Falcon Superfund Site Amendment to March 17, 2005 Letter

Dear Mr Casanova:

I'd like to thank you and Ms. Moran for a very helpful discussion on April 5, 2005 regarding the March 17, 2005, letter that discussed the EPA's review of the National Oil Recovery Corporation's (NORCO) Field Sampling Plan and NORCO's suggested amendments to the Plan.

After the conference call, I had the opportunity to discuss the project and upcoming submittals with Richard Bergner, and we suggest the following additional amendments to the Plan:

- Soil sampling will be performed in the Shedd's backyard, provided that they agree to the sampling.
- The amended plan will include the sampling of sediment in Redfish Bay near the current docking facility.
- NORCO will address the sampling of the wetlands in a separate plan after the issue of the ARM Refining and Plains Marketing spills have been resolved. Also, the sampling of the wetlands should be performed after the pipelines have been evacuated. NORCO is aware that this course of action will require a separate or supplemental QAPP and FSP.
- Due to the likelihood of detecting contamination from a host of potential sources, sampling of the drainage ditch across Hwy 2725 from the North Site will not be performed. If the sampling on the NORCO property on the northwest side of 2725 shows evidence of contamination above the appropriate standard, then additional sampling will be performed.
- Due to the possibility that Plains Marketing may be the source of the contamination that has been seen on the southwest side of Bishop Road, in the vicinity of the North Site, sampling will not be performed until after the Plains Marketing Monitor wells have been sampled. If the sampling on the NORCO property on the northeast side of Bishop Road shows evidence of contamination above the appropriate standard, then additional sampling will be performed.



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- Since no effluent pipe exists at the permitted NPDES discharge point no sampling will be performed in Corpus Christi Bay.
- Since NORCO has not controlled the "old" docking facility for over 20 years, no sampling will be performed at the old docking facility.
- In the amended plans additional ARARs will be listed and used.
- NORCO will utilize TCEQ Ecological Screening Levels.

Please feel free to contact me concerning these additional proposed amendments to the sampling plan or to discuss any issues.

Sincerely,
BNC Engineering, LLC



Stephen Halasz
Project Coordinator

cc: Richard Bergner